

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

MICHAEL BROWN, SR., AND LESLEY )  
McSPADDEN, )  
Plaintiffs, )  
vs. ) Cause No: 4:15-cv-00831-ERW  
CITY OF FERGUSON, MISSOURI, )  
FORMER POLICE CHIEF THOMAS ) **JURY TRIAL DEMANDED**  
JACKSON, AND FORMER POLICE )  
OFFICER DARREN WILSON, )  
Defendants. )

***DEFENDANTS' MOTION TO FILE UNDER SEAL***

COMES NOW Defendants, City of Ferguson, Missouri, Former Police Chief Thomas Jackson, and Former Police Officer Darren Wilson ("Defendants"), by and through their attorneys, and for their Motion to File Under Seal, state as follows:

1. Exhibit A to this Motion to File Under Seal is a list of identities for known witnesses that testified before the grand jury in the matter of *State of Missouri v. Darren Wilson*.
2. Given the safety and confidentiality concerns regarding witness identities, the filing of Exhibit A to this Motion to File Under Seal on PACER has been redacted.
3. Counsel for Defendants will personally deliver an un-redacted hard copy of Exhibit A to the Court.
4. The un-redacted version will also be disclosed to Plaintiffs' counsel.

WHEREFORE, Defendants respectfully requests that this Court grant Defendants' Motion to File Under Seal and for such other and further relief as this Court deems just and proper.

/s/Peter J. Dunne

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I hereby certify that a copy of the foregoing filed electronically with the Clerk of the Court this 7<sup>th</sup> day of March, 2016, to be served by operation of the Court's electronic filing system upon the following:

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/s/ Peter J. Dunne

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